

EPAP FAQs

Q: Another US academic institution has asked me to be a paid consultant or independent contractor on a grant. Is this an EPAP?

A:

It depends on the nature of the consulting.

By definition, an EPAP is an activity “that is not included within one’s primary university duties.” If the nature of the engagement is research, then the activity is likely NOT an EPAP since research is one of the three missions of the University and often part of part of your university work. The determination that the activity is not an EPAP increases if the grant work at the other university is funded by a federal agency. **NOTE: If a federal agency is the source of the funds, then significant review must occur if the work should flow through the Office of Sponsored Research at the University.**

If the work is not research in nature AND the other university is paying for consulting from their own internal funds, then the activity might be an EPAP. Careful review is needed at the department level for such proposed activity to ensure any applicable University policies or concerns are being addressed.

Q: I am a faculty member and on a review panel for NIH (or another federal agency). Do I have to submit an EPAP?

A: No. In accordance with the conflict of commitment policy, this type of activity for a US federal agency would be considered a secondary duty and is not an EPAP.

Q: I participate on a Data Safety Monitoring Board/Committee (DSMB/C) for another University on a NIH grant. Is this activity an EPAP?

A: Yes. It is not research nor is it a grant or scientific review panel directly for the US federal government. It should be submitted.

Q: Is there a maximum amount of dollars that I can accept for an EPAP?

A: Certain schools such as the School of Medicine or Dentistry have policies in place that require the compensation to be within certain limits based on fair market value and those schools should be contacted directly. **NOTE:** As the federal agencies begin to establish their conflict of commitment policies in 2021-2022, this answer may be adjusted.

Q: I am in an EHRA NF position. Would my EPAP requests be reviewed differently than faculty?

A: Yes, because the two categories are different in the nature of their jobs. Employees working in EHRA NF positions have a detailed set of responsibilities and duties. Replicating such type of work for another entity is generally not allowed. Using your professional knowledge to provide guidance for another entity could be allowable.

Q: I want to start a business that provides a service or product different from my work at the University. I understand I need to submit an EPAP since I have ownership or equity in the business. Can I be a vendor or independent consultant to my department or other units at UNC Chapel Hill?

A: No. There is a state statute that restricts state employees from these types of activities with the University. Please see the Avoiding Vendor Conflicts of Interest policy.

<https://policies.unc.edu/TDClient/2833/Portal/KB/ArticleDet?ID=131408>.

If you have a unique skill that your unit (or another department) would like to access, then please consult with your supervisor about including those activities as an extra part of your job, on a temporary basis.

Q: It is easier to have my own consulting firm to handle my speaking and/or consulting engagements rather than use my personal name. Do I have to submit an EPAP?

A: Yes, you must submit an EPAP for the consulting firm AND indicate the entities with which the consulting firm is contracting work. Example: you are a physician, and your consulting firm is Green Sky Unlimited, your EPAP will need to indicate that entity. BUT you will also need to indicate the companies that Green Sky Unlimited is working with such Merck, GSK, or BioTech Pharma.